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April 28, 1997

VIA HAND DELIVERY

EX PARTE OR LATE FILED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED
APR 28 1997
Federal Communications Commission
Office of Secretary


Re: Federal-State Joint Board on Universal Service
CC Docket No. 96-45
EX PARTE PRESENTATION

Dear Mr. Caton:

On April 27, 1997, Leonard J. Kennedy, of Dow, Lohnes & Albertson, and Susan B. Murphy of Comcast Corporation, met by telephone with James Casserly, of Commissioner Ness' office to discuss Comcast's position in this docket. The positions discussed were consistent with those taken in reply comments filed by Comcast Corporation on August 22, 1996. The attached document was distributed to Mr. Casserly on April 28, 1997.

In accordance with the requirements Section 1.1206(a) of the Commission's Rules, an original and one copy of this letter are being submitted to the Secretary's office. If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,


Leonard J. Kennedy
Counsel for Comcast Corporation

LJK/jc
Enclosure:

cc: James Casserly, Esq.

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Give America's Schools and Libraries A Real Choice for Technology

Presented to
The Federal Communications Commission
by
Comcast Online Communications

April 28-29, 1997



Overview

- ◆ Background
- ◆ Comcast's Education Pledge
- ◆ Academics Online™ Initiative
- ◆ Academics Online™ Products
- ◆ Implementation/Pricing Considerations
- ◆ Educator Testimonials
- ◆ Conclusion

Background

- ◆ Schools and libraries view the Universal Service Fund as a key source to help cover the cost of “getting online.”
- ◆ They are looking for the fastest, most reliable, most cost-effective solution available.
 - Schools, in particular, need high-speed access to effectively integrate the Internet into limited class time and to ensure students remain “focused” while online.
- ◆ Cable providers, such as Comcast, are committed to helping them achieve their goals-- and can do it better and more cost effectively than many telephone companies.
- ◆ Schools and libraries want and deserve the right to choose who will get them connected to the Internet.

Comcast's Education Pledge

- ◆ Comcast is committed to providing schools and libraries with solutions that are:
 - Practical
 - Scalable
 - High-speed
 - Cost-effective
 - Easy to implement
 - Easy to use
 - Responsive to their changing needs

Comcast's Education Pledge

- ◆ Why is Comcast better positioned to provide these solutions than telephone companies and others?
 - Most schools are already wired with cable-- which makes it easy to implement Internet connectivity via cable modem technology.
 - Comcast already has long-standing relationships with schools as part of our Cable in the Classroom initiative.
 - Comcast has a local presence-- with teams of management and service staff in every market to respond to educator's needs and issues.

Comcast Academics Online™

- ◆ A corporate program dedicated to getting K–12, higher education, and libraries online
- ◆ Our K–12 and library commitment: To provide the following items *at no cost*.
 - A single cable modem (including some wiring and hardware/software)
 - Unlimited, high-speed Internet access
 - Access to the Comcast OnlineSchoolyard™ or Comcast@Home interface
 - » The OnlineSchoolyard will contain over 500 curriculum links and educational content specially designed for the high-speed cable modem environment
 - » Comcast@Home contains cultural and locally-focused links and content specially designed for the community environment
 - School/library e-mail address
 - Parental control (filtering) software
 - Training materials
 - Complimentary curriculum content (online and paper-based – schools only)
 - Website hosting (up to 5MB)

Comcast Academics Online™

- ◆ K-12 activities to date:
 - Over 30 schools have been installed across 5 states
 - 75 additional installations expected to be completed by 5/30/97
 - Total of 350 schools expected to be installed by 12/31/97
- ◆ Higher Education activities to date:
 - Towson State University/Comcast partnership formed; dormitory rooms and faculty offices expected to be wired by start of fall semester
 - Additional university/college discussions are underway
- ◆ Library activities to date:
 - Since commitment was announced this month, 1 library has been installed
 - Discussions with community libraries are underway

Comcast Academics Online™ Products and Services

◆ K-12 Product

- Comcast Online will respond to any school that desires school-wide cable modem connectivity. Stand-alone and network solutions will be offered in addition to the following:
 - » OnlineSchoolyard templates for school customization
 - » Supplemental training for educators and students
 - » Discounted parental control software and education curriculum materials
 - » Web Site development assistance

◆ Library Product

- Comcast Online will respond to any library that desires library-wide cable modem connectivity. Stand-alone and network solutions will be offered in addition to the following:
 - » Supplemental training for library staff
 - » Discounted parental control software
 - » Web Site development assistance

Implementation/Pricing

- ◆ Since most schools are already wired with cable, Comcast can offer connectivity solutions at more competitive pricing.
- ◆ Example:
 - A high school in the New Jersey recently solicited bids from AT&T, MCI , Bell Atlantic, and Comcast to connect 25 computers to the Internet.
 - The Comcast solution could save the school up to 65% in implementation expenses and ongoing expenses.

*Saving schools and libraries money makes
the Universal Service Fund go further.*

*This makes it possible for more
schools and libraries to get online.*

Educator Testimonials

- ◆ Teachers and students who already have Comcast cable modems in their schools are thrilled with their Internet access speed and are grateful for the attention and support they have received from Comcast.
- ◆ Attached are recent testimonials received from:
 - Sue Taskey, Technology Administrator, Brentwood Elementary School, Sarasota, Florida
 - Reverend Edward L. Rauch, President, Father Judge High School, Philadelphia, Pennsylvania
 - Richard Paul, Librarian, John F. Kennedy Memorial High School, Iselin, New Jersey

Susan Murphy

From: Brentwood [brentwood@home.com]
Sent: Friday, April 25, 1997 12:23 PM
To: SMurphy@comcastpc.com
Subject: Our Fantastic Cable Modem and Kids!

Dear Susan,

We can not begin to thank you (and Comcast) for the wonderful opportunity you have given our students. We really enjoy the fast internet access and easy interface you have provided but there is much more we are truly grateful for.

When we were contacted by Comcast to provide internet access at a speed we could only imagine, we were a little skeptical because our prior experience was with America Online and a 14.4 modem. We were excited about the integration of the internet into instruction but thought we had a long way to go. We were wrong! As soon as we said yes to the cable modem you offered we began finding not only wonderful resources but websites that correlated to our math and reading series. Our students technology education skyrocketed with the skills your webmaster Rich Swier shared with our fourth graders. His patience and friendliness was invaluable. Our kids really enjoyed him very much. After explaining a home page he actually built one with our students. This type of support plus the new resource Too Cool For Grownups is wonderful. The speed of our modem not only holds a child's interest (they have SHORT attention spans!) but also makes completing a lesson in a class period much easier. We are currently a non-networked school, as you know, and access to the internet at one site must service over 1100 students and staff, so the speed is very important so that we can get as many as possible on. Our students and staff have several pages of bookmarks already and are adding every day.

We are utilizing your cable modem constantly to enhance our instructional needs and can not begin to thank you for this opportunity. Please come visit with us at any time and we will share new ideas and websites we have found. Thank you again for all you have helped us accomplish.

Sincerely,
Sue Taskey

father judge high school



3301 SOLLY AVENUE
PHILADELPHIA, PENNA. 19136

DE 8-9494

March 26, 1997

Mr. Edward S. Pardini
Vice President and General Manager
Comcast Philadelphia
11400 Northeast Avenue
Philadelphia, PA 19116

Dear Mr. Pardini:

On behalf of the 1,356 students and 70 faculty members of Father Judge High School, I would like to thank Comcast for selecting Father Judge to partner with your company in piloting and validating the use of cable modem technology in a classroom environment. You have enabled the Father Judge community to experience first hand the technology of the 21st century.


Because of the superior speed advantage of the Comcast cable network and the General Instrument SURFboard cable modem technology, as compared to the conventional telephone network and telephone modems, our students are now able to increase their learning experiences and to complete much more work in the short time span of a 45 minute class period. This is a significant educational achievement. Not only is the student able to accomplish more in a given period of time, but the speed of the Internet access is a compelling force in retaining the student's attention to the learning task at hand. We thank you for your help and would like to show our appreciation for your partnership with Father Judge.

For the past 21 years, Father Judge has had the pleasure of hosting the top high school track and field athletes of the East Coast at the annual Judge Relays. As part of this festival, the Judge Relay Executive Committee each year holds two special invitational events to spotlight the best male and female track athletes of the year. This year we have named the girls' invitational event in honor of

Comcast in recognition of the outstanding support you and your 350 employees have extended to the Father Judge community.

You or your designees are invited to present the winners of the Comcast Cablevision Girls' Invitational 3000 Meter Run with a gold watch along with silver and bronze medals to the 2nd, 3rd place finishers. This year the Judge Relays will be held on Saturday, April 19, from 9:00 a.m. to 4:00 p.m. It will be my pleasure to be your host for the day. Please dress casually and plan to arrive at the officials tent prior to 1:30 p.m. If you have any questions, please feel free to contact me at (215) 338-9494 x 100.

Sincerely yours,



Rev. Edward L. Rauch, O.S.F.S.
President

ELR:rfs

Susan Murphy

From: JFK Memorial High School [jfk@home.com]
Sent: Monday, April 28, 1997 8:43 PM
To: smurphy@comcastpc.com
Subject: Cable connection

Dear Susan,

It was good to meet you on Friday and we will get the specifications on our proposed LAN hardware to you as soon as we can. I write to express in print my excitement about the quality of the cable modem connection in our library. It has made a world of difference in the ease with which the use of the Internet can be integrated into the school's curriculum in virtually any subject. Internet use in the library has become a quality resource for both students and teachers rather than the exercise in frustration and futility that it was too often when we were using conventional dial-up modems. With the new connection I can count on a reliable and fast connection that makes instruction on the use of the Net much more productive. Students conduct more effective searches; can locate, access, and evaluate the information they find much more efficiently, and can make way for other students to use the resource in a much more timely manner. In the Information Age, the library, as the school's information resource, must assume a central role in the daily academic life of the school. Effective Internet use and instruction is at the heart of this role, the cable connection to the Net has been a great boon in our journey toward that goal.

Thank You,
Richard Paul, Librarian
John F. Kennedy Memorial High School
Iselin, NJ

Conclusion

- ◆ The Federal Communications Commission must make the most efficient use of the Universal Service Fund to promote school and library connectivity -- the best way to ensure this is to give schools and libraries a choice of technology providers.
- ◆ The public interest will only be served by letting competition drive down the need for Universal Service Fund subsidies. If there is no choice, there is no guarantee that the most cost effective solution has been presented.
- ◆ *Comcast is not only committed to providing schools and libraries with the most cost effective Internet solution available -- we are committed to providing solutions that are easy to integrate and responsive to their ever-changing needs.*

The FCC must preserve the right for schools and libraries to choose their technology provider.